

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: <b>Michelle Gilyard</b>	: CHAPTER: 13	<b>Date: 12/1/2016</b>
	:	<b>Time: 11:00 A.M.</b>
	: NO.: <b>16-13230</b>	900 Market Street, Rm. #2
DEBTOR	:	Philadelphia, PA 19107

**REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to F.R.C.P. 34, Objectors hereby request that the Respondent produce for inspection by the undersigned counsel for the Objectors, the following documents:

1. Respondent in its proof of claim alleges cost incurred for **Principal Payments & Interests** in the amounts of **\$10,115.50**. Objector, therefore, requests that Respondent provide a photocopy of said aforesaid fees, in addition to photocopy of paid invoice and/or cancelled check for same.
2. Respondent in its proof of claim alleges cost incurred for **Pre-Petition Fees** in the amounts of **\$5,702.56**. Objector, therefore, requests that Respondent provide a photocopy of said aforesaid fees, in addition to photocopy of paid invoice and/or cancelled check for same.
3. Respondent in its proof of claim alleges cost incurred for **Escrow Advances** in the amounts of **\$4,629.77**. Objector, therefore, requests that Respondent provide a photocopy of said aforesaid fees, in addition to photocopy of paid invoice and/or cancelled check for same.
4. Respondent in its proof of claim alleges cost incurred for **Projected Escrow Shortage** in the amounts of **\$238.73**. Objector, therefore, requests that Respondent provide a photocopy of said aforesaid fees, in addition to photocopy of paid invoice and/or cancelled check for same.

Respectfully submitted,

**By: /s/ Michael D. Sayles Esquire**

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